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Attorneys for Defendant CALEB
GARCIA ALAMILLA

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ALEXANDRA RASEY-SMITH;
GORDON GENE MACCANI; and
JANET MACCANI,

Plaintiffs,

v.

CITY OF LOS ANGELES; CALEB
GARCIA ALAMILLA; and DOES 2-
10, inclusive,

Defendants.

Case No. 2:24-cv-03265-MWC-SSC

**AMENDED JOINT STIPULATION
AND REQUEST TO CONTINUE
DISCOVERY IN ORDER TO
MEDIATE; AND STATEMENT OF
GOOD CAUSE THEREFOR**

**[PROPOSED ORDER Submitted
Concurrently]**

Judge: Hon. Michelle Williams Court

Trial Date: April 6, 2026

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9 GORDON GENE MACCANI, and JANET MACCANI
10

11 Hydee Feldstein Soto, City Attorney (SBN 106866)
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1 IT IS HEREBY STIPULATED by and between Plaintiffs ALEXANDRA
2 RASEY-SMITH, GORDON GENE MACCANI, JANET MACCANI and
3 Defendants CITY OF LOS ANGELES and CALEB GARCIA ALAMILLA, the
4 parties—through their undersigned counsel, as follows:

5 WHEREAS, this case concerns an officer involved shooting that occurred on
6 February 3, 2024 involving decedent Jason Maccani in the City of Los Angeles;

7 WHEREAS, the defendants CITY OF LOS ANGELES and CALEB
8 GARCIA ALAMILLA have filed Answers to Plaintiffs' Complaint;

9 WHEREAS the parties have agreed to mediate the case in advance of
10 incurring costs associated with extensive discovery;

11 WHEREAS, the parties have scheduled a full-day mediation session for
12 October 15, 2025 with Richard Copeland, and no earlier date was available;

13 WHEREAS, both sides have mediated with Copeland before and have a high
14 degree of confidence in his abilities, and thus believe it is better to wait for a
15 mediation with Copeland instead of selecting another mediator ;

16 WHEREAS, if settlement may be achieved before experts are retained, it will
17 be a cost savings and may help the Parties to reach a settlement;

18 WHEREAS, Deputy City Attorney Ty Ford is double-booked for trials in
19 September, with the case of *Hasmik Jasmine Chinaryan v. City of Los Angeles, et al.*
20 (USDC Case No. 2:19-cv-09302-MCS-E) set for Trial beginning on September 16,
21 2025 (Est. duration 5 days), and the case of *Joseph LaRocca v. City of Los Angeles,*
22 *et al.* (LASC Case No. 24STCV07744) set for Trial set on September 22, 2025; and
23 also has another trial in early October: *Shirley Huffman v. City of Los Angeles, et al.*
24 (LASC Case No. 22STCV38178), set for Trial on October 7, 2025. Mr. Ford has no
25 "second chair" or other person available at the City Attorney's office to handle trial
26 preparation and/or depositions in his stead due to the current workflow and staffing
27 shortages;

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1 WHEREAS, Plaintiff's counsel Dale Galipo is expected to be in trial from
2 September 9, 2025, until September 19, 2025, in the case of *Stephenson v. State of*
3 *Cal.*, Case No. ED CV21-00526-JAK-DTB, and he takes the Defendant-Officer
4 depositions personally.

5 WHEREAS, Defense counsel for Officer Garcia Alamilla (Susan Coleman)
6 has a pre-planned prepaid vacation out of the country from September 18 to 26,
7 2025 (in part to run the Berlin marathon), and has a state court jury trial beginning
8 on September 29, 2025, in *Crystal Gonzales v. Petersen Automotive Museum, et al.*

9 WHEREAS, the parties would like to continue fact discovery and expert
10 discovery to increase the possibly of resolving the case before having to incur the
11 costs associated with retaining experts and also because they do not believe they can
12 finish the depositions before the current discovery cut-off date given the schedules
13 of counsel and witnesses;

14 WHEREAS, due to the schedule of the three separate attorneys' offices and
15 problems with the availability of the involved officers (both defendant and non-
16 defendant officers), the Parties have been unable to conduct their depositions to
17 date. The parties have propounded and responded to written discovery and have
18 subpoenaed documents from third-parties;

19 WHEREAS, the parties have requested one prior extension to the Court's
20 Civil Trial Order, which was denied by the Court, but they are providing additional
21 relevant details and information herein to provide good cause and to assist the
22 Court's decision;

23 WHEREAS, the Parties' proposed change in the discovery schedule will not
24 affect the Trial date or any filing deadlines in this matter;

25 Therefore, the parties jointly request a continuation of the current relevant
26 discovery dates and deadlines as follows:

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	Current Date	Requested Date
Fact Discovery Cut Off	Friday, October 3, 2025	Friday, November 14, 2025
Expert Disclosure Due	Friday, October 10, 2025	Friday, November 21, 2025
Expert Disclosure (Rebuttal) Due	Friday, October 24, 2025	December 5, 2025
Expert Discovery Cut Off	Friday, November 7, 2025	Friday, December 19, 2025

All other Court-ordered dates shall remain in effect.

IT IS SO STIPULATED.

Dated: August 27, 2025

LAW OFFICES OF DALE K. GALIPO

By: /s/ Eric Valenzuela

Eric Valenzuela
Attorneys for Plaintiffs

Dated: August 27, 2025

LOS ANGELES CITY ATTORNEY'S
OFFICE

By: /s/ Ty Ford

Ty Ford, Deputy City Attorney
Attorneys for City of Los Angeles

Dated: August 27, 2025

BURKE, WILLIAMS & SORENSEN, LLP

By: /s/ Susan E. Coleman

Susan E. Coleman
Attorneys for Defendant
CALEB GARCIA ALAMILLA

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ELECTRONIC SIGNATURE CERTIFICATION

I, Susan E. Coleman, hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the electronic filing.

Dated: August 27, 2025

BURKE, WILLIAMS & SORENSEN, LLP

By: _____

Susan E. Coleman
Attorneys for Defendant
CALEB GARCIA ALAMILLA